

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE AKA JUDY MC GRATH, PLAINTIFF

VS.

JOE OTERI, ET AL , DEFENDANTS

# 12-CV-5726  
CIVIL ACTION  
JURY TRIAL DEMANDED

FILED

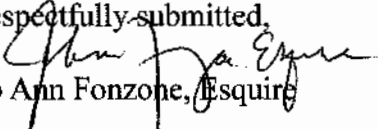
APR -9 2018

MOTION FOR EXTENSION OF TIME TO REPLY TO DEFENSE RESPONSE TO PLAINTIFF'S SECOND MOTION TO COMPEL ANSWERS OR SUFFICIENT ANSWERS TO DISCOVERY AND MOTION THAT ALL PHRASES OF FACTUAL CONTENT IN THE (UNANSWERED OR INSUFFICIENTLY ANSWERED )INTERROGATORIES SERVED ON DEFENDANTS ARE DEEMED ADMISSIONS OF FACT DUE TO THEIR BLATANT UNREASONABLE DELAY IN PROVIDING ANSWERS OR SUFFICIENT ANSWERS

Plaintiff, who was disabled by the aggravated assaults and injuries she survived on October 6, 2010 is compelled to file this motion as she is still treating for her injuries , has chronic pain, and is not supposed to be working . Ergo, defense counsel 's actions are causing Plaintiff more pain and suffering and exacerbation of her cardiac, neck , right shoulder , arm conditions. Defense counsel is well aware of this fact, yet continues to harass Plaintiff by filing these unresponsive responses . Rather than providing any informative answers to her Interrogatories or Document Requests, so that she has the sufficient information from the defendants which she is entitled to have, defense counsel neglects to provide Answers. Conversely, Plaintiff has recently sent an enormous amount of medical records to defense counsel March 23, 2018 in her continuing compliance with FRCP 26.

Plaintiff also is awaiting this Court's decision on her request for counsel or co-counsel to help her in the discovery process, depositions and resolution of this litigation. Plaintiff most recently filed that Request in November 2017, and orally at the conference January 24, 2018.

Respectfully submitted,

  
Jo Ann Fonzone, Esquire

CERTIFICATE OF SERVICE

I Jo Ann Fonzone aka Judy Mc Grath hereby certify that I have on this day caused to be served a true and correct copy of the foregoing Motion for Extension of Time on the following :

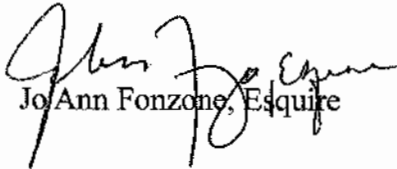
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Jo Ann Fonzone, Esquire

4/09/18